

**ORIGINAL**

Before the  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20554

**DOCKET FILE COPY ORIGINAL**

**RECEIVED**

SEP 15 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Implementation of the Subscriber Carrier )  
Selection Changes Provisions of the )  
Telecommunications Act of 1996 )

CC Docket No. 94-129

Policies and Rules Concerning )  
Unauthorized Changes of Consumers' )  
Long Distance Carriers )

**COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY,  
PACIFIC BELL, AND NEVADA BELL  
ON FURTHER NOTICE OF PROPOSED RULEMAKING**

SOUTHWESTERN BELL TELEPHONE COMPANY  
PACIFIC BELL  
NEVADA BELL

Robert M. Lynch  
Durward D. Dupre  
Mary W. Marks  
Marjorie M. Weisman  
One Bell Center, Room 3520  
St. Louis, Missouri 63101  
(314) 235-2507

Nancy C. Woolf  
Jeffrey B. Thomas  
140 New Montgomery St., Room 1529  
San Francisco, CA 94105  
(415) 542-7661

Their Attorneys

September 15, 1997

No. of Copies rec'd  
List ABCDE

044

Table of Contents - CC Docket No. 94-129

I.	<u>SUMMARY</u> .....	1
II.	<u>THE COMMISSION SHOULD ADOPT A THREE-STRIKES APPROACH TO CONTROL SLAMMING ABUSES</u> .....	3
III.	<u>SECTION 258(a) PROHIBITIONS</u> .....	5
	A. <u>Application of the Verification Rules to All Telecommunications Carriers</u> . . .	5
	B. <u>Viability of the “Welcome Package” Verification Option</u> .....	7
	C. <u>Application of the Verification Rules to In-Bound Calls</u> .....	8
	D. <u>Verification and Preferred Carrier Freezes</u> .....	8
IV.	<u>SECTION 258(B) LIABILITY</u> .....	10
	A. <u>Liability of Subscribers to Carriers</u> .....	10
	B. <u>Liability of Unauthorized Carriers to Properly Authorized Carriers</u> .....	11
	C. <u>Liability of Carriers to Subscribers</u> .....	12
	D. <u>Dispute Resolution</u> .....	13
V.	<u>EVIDENTIARY STANDARD RELATED TO LAWFULNESS OF A RESALE CARRIER’S CHANGE IN UNDERLYING NETWORK PROVIDER</u> .....	14
VI.	<u>CONCLUSION</u> .....	14

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Implementation of the Subscriber Carrier	)	
Selection Changes Provisions of the	)	
Telecommunications Act of 1996	)	
	)	CC Docket No. 94-129
Policies and Rules Concerning	)	
Unauthorized Changes of Consumers'	)	
Long Distance Carriers	)	

**COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY,  
PACIFIC BELL, AND NEVADA BELL  
FURTHER NOTICE OF PROPOSED RULEMAKING**

Southwestern Bell Telephone Company (SWBT), Pacific Bell (Pacific) and Nevada Bell (Nevada), jointly "the SBC Companies," submit these comments on the Commission's Further Notice of Proposed Rulemaking (FNPRM) on the issue of slamming.

**I. SUMMARY**

Slamming is a significant and increasing problem for customers of the SBC Companies and customers nationwide. In addition, experts predict slamming will rise as competition increases in long distance as well as toll and local service calling. The SBC Companies propose a "three-strikes-and-you're out" approach to penalize telecommunications carriers with repeated slamming violations in order to deter future slamming. The three-part penalty approach would begin with a 6-month probation period for any carrier that exceeds a 2 percent threshold of primary carrier (PC) disputes as a percentage of total PC changes. This approach would increase to significant fines, should the level of slamming continue during the probationary period, and finally would escalate to additional fines and suspension of any further PC submissions by the

offending carrier. The SBC Companies urge the Commission to take quick action to adopt specific rules to protect customers as competition increases in long distance, intraLATA toll and local service markets.

The SBC Companies support the expansion of the rules to include all landline telecommunications carriers including local, toll and interLATA service providers. The executing telecommunications carriers should not be required to duplicate the PC change verification efforts of the submitting telecommunications carrier. Further, there should not be any additional requirements imposed on incumbent local exchange carriers (ILECs).

The SBC Companies support the Commission's tentative conclusion to eliminate the welcome package verification option. Also, we do not believe it is necessary or effective to verify in-bound calls to change PCs. In addition, no additional rules are necessary or desirable for PC freeze solicitations because PC protection is provided only upon customer request and solely for customer protection. Further, if a customer who has PC freeze in effect elects to change local service providers, only the customer should have the right to elect a PC freeze through the new service provider. Authorization for PC protection through automatic transfer of the service should be prohibited. When effective anti-slamming rules are implemented and enforced, the need for PC protection will be eliminated.

The Commission also examines liability for slamming. The SBC Companies submit that all products and services, including premiums not related to telecommunications service (e.g., airline miles) should be restored to slammed customers. Assuming the unauthorized carrier has provided restitution for the telecommunications service charges, the authorized carrier is made whole and the unauthorized carrier should not have to provide restitution for these services to the authorized carrier. We do not believe the customer should be absolved of all charges because,

even though the carrier was unauthorized, the customer received the benefit of the service. Therefore, the customer should be required to pay only the charges that would have been assessed if the services had been provided by the preferred carrier.

## **II. THE COMMISSION SHOULD ADOPT A THREE-STRIKES APPROACH TO CONTROL SLAMMING ABUSES**

The SBC Companies believe that removal of economic incentives and enforcement of carrier accountability are essential to reducing slamming. The SBC Companies therefore recommend that the following practices be implemented immediately for any and all carriers that participate in slamming (further detail provided in IV. SECTION 258(B) LIABILITY).

In the event of any unauthorized change to a customer's carrier, the slamming offender must:

- remit any excess difference in charges for the service provided to the customer as well as any associated expenses;
- reimburse the authorized carrier for all lost revenues as well as any associated expenses; and
- reimburse the Local Exchange Company for all expenses associated with restoral of the customer's service to the original carrier of choice.

In addition, the SBC Companies propose that the Commission adopt the following "three-strikes-and-you're-out" approach which establishes industry performance thresholds and provides for the assessment of graduated penalties. This approach is designed to penalize those few offenders that account for the vast majority of slamming disputes. At the same time, this approach is designed to achieve the fine balance of customer protection and fair

competition, without imposing additional requirements on the majority of carriers that make it their practice to operate in a conscientious and responsible manner. It requires collaboration and coordination by all parties involved to enforce actions and penalties.

#### Strike 1 - Probation

The first strike will occur when more than 2 percent<sup>1</sup> of a carrier's service orders for PC changes are disputed in any given month, and the carrier is unable or chooses not to produce valid evidence of customer authorization for changing the PC.<sup>2</sup> The slamming carrier will be placed on probationary status for a period not to exceed six months. Under this probation period, the offending carrier will be required to take mandatory steps to eliminate slamming and to monitor its internal processes, as well as the actions of its employees and agents, in order to achieve a PC dispute level less than 2 percent. Probationary status will be removed once a carrier has demonstrated for six months that it is no longer engaged in PC slamming based on the above threshold.

#### Strike 2 - Penalties

The second strike will occur when the corrective action in strike one proves inadequate

---

<sup>1</sup> Based on prior experience, the SBC Companies have determined that establishing a 2% threshold could eliminate approximately 75% of all slamming activity. Approximately 16% of carriers exceed this threshold, yet these same carriers account for nearly three-fourths of all slamming disputes.

<sup>2</sup> Southwestern Bell and Pacific Bell currently offer "no fault PIC switchback" service through their Access Services tariffs. This offering recognizes that misunderstandings and errors occasionally occur when a PC changes and was designed to streamline the restoration process. This strike is not precluded by the interexchange carrier's (IXC's) selection of that service.

and the slamming disputes continue to exceed the 2% threshold at the end of the probation period. The offending carrier will be subject to a fine of no less than \$5,000 per slamming occurrence during the probationary period. The fine will be remitted to the appropriate regulatory agency. These penalties are intended to further discourage PC slamming and to encourage offending carriers to revise their business practices.

### Strike 3 - Additional Penalties and Suspensions of PC Submissions

Strike three will occur if the offending carrier continues to engage in PC slamming in excess of the 2 percent threshold during its probation period. The additional penalties that will result will include fines of up \$10,000 per occurrence, and the possibility of temporary or permanent suspension of the carrier's ability to initiate PC changes to a telephone subscriber's service.

## **III. SECTION 258(a) PROHIBITIONS**

### **A. Application of the Verification Rules to All Telecommunications Carriers**

In the FNPRM, the Commission seeks comments on the prohibitions contained in Section 258(a). The Commission asks whether the scope of the rules should be expanded to include all telecommunications carriers.<sup>3</sup>

The SBC Companies support the expansion of the rules to include all landline telecommunications carriers, including local, intraLATA toll, and interLATA service providers.

---

<sup>3</sup>FNPRM, para. 2.

The SBC Companies presume that this FNPRM does not apply to wireless providers as that industry has not experienced the slamming problems that prevail in the landline industry.

The Commission asks whether the term “subscriber” should be used in place of the term “customer” in Section 64.1100.<sup>4</sup> The SBC Companies recognize that these terms are often used interchangeably; however, it is important to clearly define whichever term is chosen in the context of this rulemaking proceeding. It is essential to have a broad definition that allows the service provider to speak with all persons who are authorized to make the purchasing decision. Thus, the definition should not be limited to only the person identified on the bill. For business service, the bill often contains only a corporation name and/or one person who may or may not be the telecommunications decision maker. Likewise, for residential service, the bill may only reflect one partner to the marriage and/or omit roommates. Service providers must be allowed to obtain authority from whomever at the business or residence is authorized to make the purchasing decision. Thus, the definition should include broad language such as the following: Customer/Subscriber indicates any person, firm, partnership, corporation, or lawful entity that is authorized to order telecommunications services supplied by a telecommunications services provider.

The Commission tentatively concludes that Section 258 does not require an executing telecommunications carrier to duplicate the PC change verification efforts of the submitting telecommunications carrier.<sup>5</sup> The SBC Companies agree with and support this tentative conclusion. The executing carrier is simply the “middle man” who effects the request of the

---

<sup>4</sup>FNPRM, para 2

<sup>5</sup>FNPRM, para 4

submitting carrier. Requiring additional duplicative verification procedures would impose an unnecessary obligation upon the executing carrier.

The Commission asks whether incumbent LECs should be subject to different requirements because of any advantages over other carriers arising from their incumbency.<sup>6</sup> The SBC Companies believe that no additional requirements are needed. If the Commission decides to impose additional requirements upon incumbent LECs, however, any such requirements must apply equally to all incumbents including LECs and IXCs. IXCs have the same potential incumbency advantages in the long-distance market as LECs do in the local exchange market. For example, incumbent IXCs receive prompt notification from the LEC of a customer's decision to change carriers enabling the incumbent IXC to contact and try to retain its customer. Thus, any additional requirements or prohibitions upon incumbent LECs must also apply equally to incumbent IXCs.

**B. Viability of the "Welcome Package" Verification Option**

We support the Commission's tentative conclusion to eliminate the "welcome package" verification option.<sup>7</sup> While the SBC Companies may utilize a welcome package as a customer service, we believe it is ineffective as a means of verifying an order. For example, the welcome package is not timely as it requires a 14-day waiting period. In addition, customers often do not even read the material. Therefore, the SBC Companies support the elimination of this option.

---

<sup>6</sup>FNPRM, para 5

<sup>7</sup>FNPRM, para 18

**C. Application of the Verification Rules to In-Bound Calls**

We do not agree that verification of in-bound calls to change PCs is necessary or effective in deterring slamming.<sup>8</sup> Customers who call to change a PC do so freely with an understanding of the consequences of their action. Thus, to verify an order on an in-bound call would be costly and unnecessary. Rather than focusing on in-bound calls, the Commission should address other marketing and sales practices that have created opportunities for slamming. For example, entry forms, raffle tickets, sweepstakes and other contests often include hidden authorization resulting in a PC change. Additionally, the SBC Companies have become aware of new and emerging trends including instances where telemarketers have made misrepresentations leading to customer confusion and increased opportunities to engage in slamming.

**D. Verification and Preferred Carrier Freezes**

The Commission also seeks comment on whether the primary interexchange carrier (PIC) change verification procedures should be extended to PC freeze solicitations.<sup>9</sup> We do not believe an extension of the rules is needed in this area. PIC protection was developed solely as a customer safeguard. The SBC Companies have received customer slamming complaints for many years. PIC protection was developed to stop slamming, and it was implemented long before the Act allowed LECs to foresee the day when they would be permitted to provide long distance service. Neither SWBT, Pacific nor Nevada market or charge for PIC protection; it is provided only to protect customers and only when a customer indicates the need for protection

---

<sup>8</sup>FNPRM, para 19

<sup>9</sup>FNPRM, para 21

from slamming. Thus, PIC change verification procedures need not be extended to PC freeze solicitations.<sup>10</sup>

The Commission seeks comment on how best to reconcile the competing strains of providing adequate customer protection and facilitating competition among carriers.<sup>11</sup> The Commission needs to recognize and resolve the root cause of slamming before rules can be established that will strike the right balance between fair competition and customer protection. When the Commission establishes and enforces rules that remove the need for PC protection, the Commission will achieve its goal. We submit that our proposed three-strikes approach is the method to eliminate slamming.

The Commission seeks comment on what practices would promote both competition and customer protection.<sup>12</sup> For example, commenters are asked to address whether, when a customer that has “frozen” his or her IXC selection switches LECs, the customer must request another PC freeze, or whether the new LEC must automatically establish the same PC freeze on the consumer’s behalf. We therefore do not support the automatic transfer of PC freezes. We believe the goal of the Commission and the service providers should be to honor customer choice. The customer’s right to choose must be preserved, and only the customer should have the right to request a PC freeze on his or her account.

---

<sup>10</sup>In the Matter of Policies and Rules Pertaining to Local Exchange Carrier “Freezes” on Consumer Choices of Primary Local Exchange or Interexchange Carriers, RM-9085, File No. CCB/CPD 97-19, Comments by Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell in Opposition to MCI’s Petition for Rulemaking, page 6-7

<sup>11</sup>FNPRM, para 22

<sup>12</sup>FNPRM, para 24

The Commission also asks what factors should be considered in assessing the lawfulness of a particular PC freeze solicitation practice in a Section 208 complaint proceeding.<sup>13</sup> We believe that PC freezes should only be initiated by customers contacting the LEC that serves the customer. Obtaining the customer's authorization for PC protection through solicitation or a statement buried in the fine print of a letter of agency (LOA) should be prohibited. Any practice which prevents the customer from initiating a change in service providers as a result of PC protection should also be prohibited.

#### **IV. SECTION 258(B) LIABILITY**

##### **A. Liability of Subscribers to Carriers**

Section 258(b) addresses the liability a provider will face when it engages in slamming. We propose the three-strikes approach, as set forth earlier, with increasing penalties as violations continue. The Commission asks about a number of issues in this area. The Commission asks for comment on whether slammed customers should have the option of refusing to pay charges assessed by an authorized carrier.<sup>14</sup> It also questions the impact on properly authorized carriers that would result if slammed subscribers were absolved of liability for unpaid charges.<sup>15</sup> In addition, it asks whether the time during which a subscriber would not be liable should be

---

<sup>13</sup>Id.

<sup>14</sup>FNPRM, para 27

<sup>15</sup>Id.

limited.<sup>16</sup> Finally, it examines the advantages and disadvantages of absolving subscribers of liability for unpaid charges.<sup>17</sup>

Although the customer did not authorize the carrier to provide the service, the customer did receive the benefit of the telecommunications service. A rule that absolves customers of the obligation to pay for all unauthorized charges would encourage fraudulent complaints. Therefore, the customer should be required to pay only the appropriate charges (i.e. only the charges that would have been assessed if the services had been provided by the preferred carrier).

As set forth in our three-strikes approach, forcing the unauthorized carrier to bear the costs it has incurred without obtaining revenue will act as an economic deterrent to prevent slamming. In addition, if slammed customers are not held liable for charges, there should be a time limit established to deter customers from taking advantage of an absolution rule. We propose allowing absolution for a maximum time period of 90 days from the date of the slam. This time limit allows for the fact that customers may not realize immediately that they have been slammed since some toll providers do not bill on a monthly basis due to low volume and/or usage.

**B. Liability of Unauthorized Carriers to Properly Authorized Carriers**

The Commission proposes to amend the rules to hold an unauthorized carrier liable to the subscribers' properly authorized carrier (whether local, toll or interLATA service provider) "in an amount equal to all charges paid by such subscriber after such violation".<sup>18</sup> We support this

---

<sup>16</sup>Id.

<sup>17</sup>Id.

<sup>18</sup>FNPRM, para 28

rule amendment. In addition, the unauthorized carrier should be liable to the properly authorized carrier for any and all expenses associated with the collection of these charges.

The slamming carrier must also reimburse the LEC for all expenses associated with restoring the customer's service to their authorized PC. Reimbursement should include, but not be limited to, expenses associated with investigations, service ordering, etc. Lastly, the unauthorized carrier should remain liable to the LEC for any and all access charges incurred to provide the unauthorized services.

**C. Liability of Carriers to Subscribers**

The Commission examines the proper way to "make whole" a subscriber victimized by an unauthorized PC change.<sup>19</sup> The SBC Companies agree that a slammed customer should receive prompt and full reparation for harm suffered as a result of unauthorized PC changes. However, the customer should only receive total reimbursement if it is determined that the customer is indeed not responsible for the charges from the unauthorized carrier. The proposed process of reimbursement is complicated in a situation where the customer already has paid the unauthorized carrier: the unauthorized carrier pays the authorized carrier, and the authorized carrier reimburses the subscriber. Because of the complexities inherent in the proposed process, we believe there should be an independent third party to ensure that restitution is properly made to all parties. It is inappropriate to penalize the LEC by placing it in the position of arbitrating for the carriers, particularly in the future when the LEC is also eligible to enter the long distance market.

---

<sup>19</sup>FNPRM, para 29

The Commission asks what types of products and services offered by telecommunications carriers should be restored to slammed subscribers.<sup>20</sup> We believe all products and services, including premiums not related to telecommunications service (e.g., airline miles) should be restored. We do not believe it is necessary, however, to require the slamming carrier to remit the value of the non-telecommunications premiums to the properly authorized carrier. Once the unauthorized carrier provides restitution for the telecommunications service, the authorized carrier is made whole. The expense of providing any non-telecommunications premiums is a business decision of the authorized carrier and one that would have been incurred whether or not the customer had been slammed.

**D. Dispute Resolution**

The Commission proposes to enact a requirement that carriers attempt to resolve disputes between themselves prior to petitioning the Commission to make a determination.<sup>21</sup> We do not generally oppose this proposal so long as unauthorized carriers are not allowed to use private negotiations as a stall tactic in the making of payments to the authorized carriers. The Commission, however, should not implement this approach as proposed. The FNPRM proposes that the Commission “entertain a request for enforcement of proposed Section 64.1170(a) only after the parties have certified that they have undertaken private negotiations and that, following these steps, unresolved issues remain.” The unauthorized carrier may not have an incentive to so certify. Certification by the authorized carrier should suffice to trigger the Commission’s enforcement action. If it is unclear, or in dispute, as to which carrier is the authorized carrier,

---

<sup>20</sup>FNPRM, para 30

<sup>21</sup>FNPRM, para 31

certification by any one carrier should suffice. Moreover, certification by one of the carriers of an attempt to negotiate should suffice. The authorized carrier cannot force the unauthorized carrier to negotiate and should not be delayed more than 45 days from the initial request for negotiation in being allowed to seek an enforcement action by the Commission.

**V. EVIDENTIARY STANDARD RELATED TO LAWFULNESS OF A RESALE CARRIER'S CHANGE IN UNDERLYING NETWORK PROVIDER**

The Commission tentatively concludes that resellers are required to give subscriber notification of changes in underlying carriers only in situations where the reseller made statements either that: (1) it would provide service to its subscribers using a particular underlying carrier, or (2) it would not change its underlying carrier without notification to its subscribers.<sup>22</sup> We support this "bright line" test which would fully protect customers' reliance interests. Carriers should not be required to use the name of another network provider whose service they may choose to resell. Nor should resellers be allowed to use the brand name of another network provider without the proper authorization.

**VI. CONCLUSION**

For all the foregoing reasons, the SBC Companies respectfully request that the Commission enter an order adopting the comments set forth herein and specifically the proposed three-strikes approach. The SBC Companies suggest that removal of the economic incentive and the assessment of graduated penalties is the best mechanism to discourage and prevent slamming. The SBC Companies urge the Commission to immediately implement the

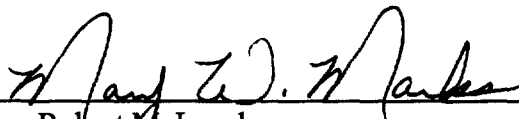
---

<sup>22</sup>FNPRM, para 39

following measures. First, the Commission should promulgate rules implementing Section 258 of the Act. The Commission must take action now to enforce the Act. Second, the Commission should formalize and levy severe fines and penalties upon slammers. Third, the Commission must stop the submission of PC changes for slammers with continued violations. We believe the SBC Companies' proposed three-strikes approach will eliminate slamming, promote greater customer satisfaction and serve the public interest.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY  
PACIFIC BELL  
NEVADA BELL

By 

Robert M. Lynch  
Durward D. Dupre  
Mary W. Marks  
Marjorie M. Weisman  
One Bell Center, Room 3520  
St. Louis, Missouri 63101  
(314) 235-2507

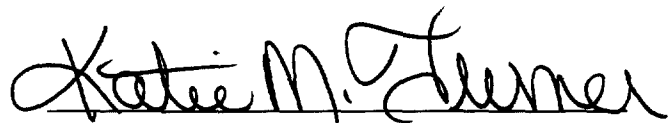
Nancy C. Woolf  
Jeffrey B. Thomas  
140 New Montgomery St., Room 1529  
San Francisco, CA 94105  
(415) 542-7661

Their Attorneys

September 15, 1997

CERTIFICATE OF SERVICE

I, Katie M. Turner, hereby certify that the foregoing, "COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY, PACIFIC BELL, AND NEVADA BELL TO FURTHER NOTICE OF PROPOSED RULEMAKING" in CC Docket No. 94-129 has been filed this 15th day of September, 1997 to the Parties of Record.

A handwritten signature in cursive script, reading "Katie M. Turner". The signature is written in black ink and is positioned above the printed name.

Katie M. Turner

September 15, 1997

ITS INC  
1231 20TH STREET  
GROUND FLOOR  
WASHINGTON, DC 20036

FORMAL COMPLAINTS BRANCH  
ENFORCEMENT DIVISION  
COMMON CARRIER BUREAU  
PLAZA LEVEL  
1250 23RD ST NW  
WASHINGTON DC 20554  
(2 COPIES)

ANDREW D. LIPMAN  
DANA FRIX  
SWIDLER & BERLIN, CHARTERED  
COUNSEL FOR ACC CORPORATION &  
COMMUNICATION TELESYSTEMS  
INTERNATIONAL  
3000 K STREET, STE 300  
WASHINGTON DC 20007

ROY L. MORRIS  
ALLNET COMMUNICATIONS  
SERVICES, INC.  
REGULATORY COUNSEL  
1990 M ST NW STE 500  
WASHINGTON DC 20036

MARK C ROSENBLUM  
PETER H JACOBY  
AT&T CORP  
295 N MAPLE AVE RM 3245H1  
BASKING RIDGE NJ 07920

MICHAEL SHORTLEY III  
FRONTIER COMMUNICATIONS  
INTERNATIONAL INC.  
180 S CLINTON AVE  
ROCHESTER NY 14646

CHARLES H HELEIN  
JULIA A WAYS DORF  
COUNSEL FOR HOME OWNERS  
LONG DISTANCE  
1850 M ST NW  
WASHINGTON DC 20036

RANDALL B LOWE  
PIPER & MARBURY  
COUNSEL FOR  
ONE CALL COMMUNICATIONS INC &  
LEXICOM INC  
1200 NINETEENTH ST NW  
WASHINGTON DC 20036

GREGORY INTOCCIA  
DONALD J ELARDO  
MCI TELECOMMUNICATIONS  
CORPORATION  
1801 PENNSYLVANIA AVE NW  
WASHINGTON DC 20006

CHARLES C HUNTER  
HUNTER & MOW PC  
COUNSEL FOR MIDCOM  
COMMUNICATIONS INC &  
TOUCH 1, INC. AND  
TOUCH 1 COMMUNICATIONS INC &  
TELECOMMUNICATIONS RESELLERS  
1620 I ST NW STE 701  
WASHINGTON DC 20006

JAMES P TUTHILL  
BETSY STOVER GRANGER  
PACIFIC BELL/NEVADA BELL  
140 NEW MONTGOMERY ST  
RM 1525  
SAN FRANCISCO CA 94105

LEON M KESTENBAUM  
H RICHARD JUHNKE  
SPRINT COMMUNICATIONS CO  
1850 M STREET NW 11TH FL  
WASHINGTON DC 20036

WM TERRY MILLER  
TELECOMMUNICATIONS CO OF  
THE AMERICAS INC  
901 ROSENBERG  
GALVESTON TX 77550

DAVID J GILLES  
ASSISTANT ATTORNEY GENERAL  
OFFICE OF CONSUMER PROTECTION  
123 W WASHINGTON AVE  
MADISON, WI 53707-7856

JAMES E DOYLE  
ATTORNEY GENERAL  
CO-CHAIRMAN  
NATIONAL ASSOC OF ATTORNEYS  
GENERAL  
STATE OF WISCONSIN  
123 W WASHINGTON AVE  
MADISON, WI 53707-7856

DAVID J. GUDINO  
GTE SERVICE CORPORATION  
1850 M ST NW STE 1200  
WASHINGTON DC 20036

CATHERINE R SLOAN ESQ  
VICE PRESIDENT  
LDDS COMMUNICATIONS INC  
1825 EYE ST NW STE 400  
WASHINGTON DC 20006

ANDREW D LIPMAN  
MARGARET M CHARLES  
SWIDLER & BERLIN  
COUNSEL FOR HI-RIM  
COMMUNICATIONS INC  
3000 K ST NW STE 300  
WASHINGTON DC 20007

WILLIAM J COWAN  
GENERAL COUNSEL  
NEW YORK STATE DEPARTMENT  
OF PUBLIC SERVICE  
THREE EMPIRE STATE PLAZA  
ALBANY NY 12223-1350

DOUGLAS M OMEN  
ACTING CHIEF COUNSEL  
OFFICE OF THE ATTORNEY GENERAL  
SUPREME COURT BUILDING  
P O BOX 899  
JEFFERSON CITY MO 65102

ALLAN G. MUELLER  
CHAIRMAN  
MISSOURI PUBLIC SERVICE  
COMMISSION  
P O BOX 360  
JEFFERSON CITY MO 65102

MARTHA S HOGERTY  
OFFICE OF THE PUBLIC COUNSEL  
P O BOX 7800  
JEFFERSON CITY MO 65102

CHARLES H HELEIN  
JULIA A WAYS DORF  
HELEIN & WAYS DORF PC  
COUNSEL FOR AMERICA'S  
CARRIERS TELECOMMUNICATIONS  
ASSOCIATION  
1850 M ST NW STE 550  
WASHINGTON DC 20036

WILLIAM MALONE  
9117 VENDOME DRIVE  
BETHESDA MD 20817-4022

WILLIAM J BALCERSKI  
EDWARD R WHOLL  
120 BLOOMINGDALE RD  
WHITE PLAINS NY 10605

ANDREW D LIPMAN  
JAMES C FALVEY  
SWIDLER & BERLIN  
COUNSEL FOR LD SERVICES INC  
3000 K ST NW STE 300  
WASHINGTON DC 20007

ELLEN S LEVINE  
ATTORNEY FOR THE PEOPLE OF  
THE STATE OF CALIF AND THE  
PUC OF THE STATE OF CALIF  
505 VAN NESS AVE  
SAN FRANCISCO CA 94102

DANNY E ADAMS  
STEVEN A AUGUSTINO  
WILEY REIN & FIELDING  
COUNSEL FOR THE COMPETITIVE  
TELECOMMUNICATIONS ASSOC  
1776 K ST NW  
WASHINGTON DC 20006

KATHY L SHOBERT  
DIRECTOR FEDERAL AFFAIRS  
GENERAL COMMUNICATION INC  
901 15TH ST NW STE 900  
WASHINGTON DC 20005

DANNY E ADAMS  
STEVEN A AUGUSTINO  
KELLEY DRYE & WARREN  
COUNSEL FOR COMPETITIVE  
TELECOMMUNICATIONS OF AMERICA  
1200 19TH STREET NW  
SUITE 500  
WASHINGTON DC 20036